

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No.: 14-CR-2783 JB
)	
THOMAS R. RODELLA and)	
)	
Defendant.)	

DEFENDANT’S SUGGESTED ADDITIONAL VOIR DIRE
TO BE CONDUCTED BY THE COURT

The Defendant, Thomas R. Rodella, by his attorneys, Robert J. Gorence and Louren Oliveros of Gorence & Oliveros, P.C., proposes the following questions to be asked by the Court of the panel during the voir dire examination:

1. Do any of you have strong opinions about the recent allegations of the Albuquerque Police Department’s use of excessive force?
 - a. What do you think about the allegations?
2. Have any of you seen any of the videos related to the allegations regarding APD’s use of excessive force?
 - a. Which videos have you seen?
 - b. What do you think about the videos?
3. Have any of you read any of the Department of Justice (DOJ) reports relating to the allegations of the use of excessive force by APD?
 - a. What have you read?
 - b. What do you think about the reports?

4. Have any of you participated in any of the rallies or protests related to the allegations of excessive force by APD?
- a. If so, when?
 - b. Which rallies?
5. Have any of you ever served on a civil jury where allegations of excessive force by a police officer were part of the trial?
6. Have any of you ever felt mistreated by a police officer?
- a. When?
 - b. What happened?

Respectfully submitted,

/s/ Robert J. Gorence 09/18/14

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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing pleading was emailed to counsel of record by CM/ECF this 18th day of September, 2014.

/s/ Robert J. Gorence 09/18/14

Robert J. Gorence